

HCaTS Draft Request for Proposal (DRFP) FAQ (5/27/15 - 7/17/15)

Please note: All information is subject to change. We are sharing this information now for transparency. Please continue to check the HCaTS interact blog for additional updates

Question	Answer
As a Small Business, we do not have the accreditations. How does this impact the evaluation of the SB Prime?	This does not affect meeting the minimum requirements of the RFP, you will just not receive the points associated with the accreditations.
Can we use our subcontractors past performance in the proposal or can we only use our (8a Small Business) past performance?	Offerors cannot take credit for their partners/subcontractors unless submitting a proposal under an existing Joint Venture.
When will the transcript, slides, and Q&A segment of the Industry Day event be emailed to attendees?	The transcript and slides are available at http://interact.gsa.gov/hrfssi .
Is an OPM TMA Project Management Plan (approved and accepted by the customer agency and OPM post award) constitute a valid contract document for validating Past Performance KSAs?	Yes, an approved TMA Management Plan is considered a valid contract document.
Employee Relations is one example under KSA 2. Will you consider EEO type services as relevant past performance? These types of services include EEO MD 715 Barrier Analysis as well as diversity awareness coaching at individual, unit and agency-wide level, EEO complaint investigations, dispute mediation, etc.	Yes, EEO type services such as these mentioned could qualify as relevant past performance for KSA 2
My firm is a SDVOSB and based on your criteria for past performance, I would have none. Prior to starting my business in 2014, I have completed multiple Human Resources Six Sigma projects while in the military and working in the federal government. In addition, I have provided consulting to non-government companies under NAICS 541611. On a most recent Solicitation (W81K04-15-R-0006) offeror's were instructed to submit Past Performance Evaluations through D&B Open Ratings. My question is "Can the D&B Open Ratings report be used as an alternative to the Past Performance substitution sheet as this Evaluation is completed through D&B and submitted by previous companies that I have worked with that are not government entities?"	No, we will not accept the D&B Open Ratings report as a substitute for a CPARS/PPIRS Report or the Past Performance Substitute Form.
Our prime contractor has 50-75% of the past performance you are looking for in the RFP. We have a very strong sub team with verifiable commercial / government contracting past experience that account for the rest of the 100%. Does that count and meet collective requirements you are looking for as past performance? When I say that the sub team meets the requirements it means: ISO 9001-2008, Human Capital Certifications, education and many other certifications and qualifications.	Offerors are prohibited from taking credit to meet any scoring element from their partners and subcontractors unless submitting the proposal under an existing Joint Venture. If submitting a proposal as an existing Joint Venture, all Relevant Experience Projects shall have been awarded to the Joint Venture and not the individual entities.
During the Virtual Industry Meeting, the speakers mentioned that special consideration will be given to particular SB categories in the event that those categories are underrepresented or completed unrepresented among the 40 highest scoring contractors. If we understand correctly, such SB categories will be reconsidered (up to three vendors per category) for award. Will those three awards be in addition to the 40 highest scoring contractors for a total of 43 contract awards, or will those three awards take place of the last three lowest scored contractors among the 40?	These awards would be in addition to the Top 40 and any tied at the 40th position.

<p>I am writing to you because, even after all of the Q&A, I and fellow TMA contractors, are not clear as to whether a single TMA Project with a single project code, competed and awarded one time, will count as a "collection of task orders" and thus be limited to a one-time use. This has enormous implications for all TMA contractor bidding on HCaTS. If a TMA project is counted as collection of task orders then the offerer will only be allowed to use a TMA Project for one of the six past performances per pool. The offerer will have to look elsewhere for individual task orders to use as past performances because individual task orders on single TMA project are not suitable to use as stand-alone task orders for a past performance. They usually comprise only a small piece of the total project in terms of cost and period of performance. They have very little meaning outside of the Project Management Plan structure, for instance, a single task order might reflect only the project kickoff meeting. It is the best interest of the government to allow the offerer to use individual TMA projects for all six past performances and allow each project should be inclusive of it incrementally-funded task orders which have no meaning on their own. If a TMA project was awarded for 5 years at 1M per year, and that is clearly validated in OPM Project Management Plan, the offerer should be scored for a 5 year project at 1M per year even if it is made up of quarterly, incremental task orders. It is in the best interest of the government not to limit the use of past performances associated with the incumbent TMA contract because of the way the projects we funded using small, incremental task orders that do not have stand-alone value. This rule should apply to all other contracts where projects were awarded and funded in the TMA-style. It should be up to the OPM Program Office to determine if a single TMA</p> <p>In previous PPIRS substitutions, clients who have since left the organization have been acceptable performance evaluators when they had the direct insight into contract performance. Will this be the case for HCaTS Past Performance substitution?</p> <p>As other non-federal, public sector agencies have significant regulatory and compliance requirements for vendors and sometimes use Federal FAR-based vehicles to award contracts, would GSA and OPM consider awarding points for contracts performed as a prime to non-federal public sector entities?</p> <p>Alternatively, would GSA and OPM consider eliminating or significantly reducing the points awarded to first tier subs for federal efforts as the standards and requirements for a prime contractor for other regulated organizations/sectors are more significant than those of federal subcontractors (e.g., state and local government, international public sector). The significant value of points currently awarded to first tier subcontractors de-values the necessary experience demonstrated by prime contractors who have direct responsibility for marketing capabilities, shaping solutions, contract management and compliance, and delivery execution – responsibilities all relevant to successful HCaTS performance.</p> <p>To compete in pool 2 for small business, is the only acceptable NAICS code for past performances 541612, or as written in the DRFP will projects with NAICS of 541611, 541612, 541613, 541618, and 61710 be considered as eligible for submission? My company's work is entirely under NAICS 541611, and is extremely relevant to KSAs 2 and 3. We are hopeful that having the "relevant" NAICS of 541611 will be sufficient to compete in Pool 2, where the predominant NAICS is 541612.</p> <p>Vendors need clear guidance/direction on NAICS codes as applied to OPM TMA work. Per FPDS records, all three OPM TMA contracts are classed in NAICS 611430, pertaining to Pool 1. Yet, the Q&A (page 61) states that, "The current OPM contract vehicle assigns NAICS Code 541611 to all task orders," and this pertains to Pool 2. HCaTS Offerors will need a clear determination of what NAICS codes apply to OPM TMA work.</p>	<p>A "collection of task orders" is defined as follows:</p> <p>Two out of the six required Relevant Experience Projects may, at the discretion of the Offeror, be a "collection of task orders" placed under a master Single Award or Multiple Award, Indefinite Delivery task order contract, or master Single Award or Multiple Award Blanket Purchase Agreement; or, any other master contract vehicle (e.g., Project Number/Title) that the task orders were directly awarded under if the following applies:</p> <ol style="list-style-type: none"> 1. The "collection of task orders" shall not exceed six task orders, and 2. None of the task orders in the collection shall also be used as a stand-alone Relevant Experience Project, and 3. Each successor task order was a logical follow-on task order to the predecessor task order, with no more than a 30 calendar day gap between the effective date of the successor task order and the end date of the predecessor task order, and 4. Each task order was awarded by an entity outside of your corporate structure, and 5. Services provided under each task order has been performed within the past five years prior to the solicitation closing date; or, be ongoing, and 6. Each task order's scope was inclusive of at least one KSA (Customized Training and Development Services, Customized Human Capital Strategy Services, or Customized Organizational Performance Improvement) and some component of the KSA-related service and/or product customized, and <p>Yes.</p> <p>Since HCaTS will be awarded using the FAR and will require contractors to perform under government-specific rules and regulations, only previous federal experience should receive additional points.</p> <p>The Government recognizes that both Prime and First-Tier Subcontractors have to comply with numerous government rules and regulations; therefore, experience gained by First-Tier Subcontractors under Federal government projects should be recognized accordingly.</p> <p>Four of the six Relevant Experience Projects have to map to at least one of the identified NAICS Codes. In this case, any of the five NAICS Codes are acceptable.</p> <p>The Government recommends any specific questions related to a Relevant Experience Project be directed to the Contracting Officer who awarded or is administering it.</p>
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Related to item 1 above, the OPM TMA vehicle subsumes two types of work – Training and Human Capital. We recommend that OPM TMA training projects be assigned a NAICS code that corresponds to Pool 1 and OPM TMA Human Capital projects be assigned a NAICS code that corresponds to Pool 2. This would be easy to do, as projects are categorized in that fashion under the OPM TMA program under both the original contracts that separated these types of services and presently as separate key service areas under the bridge contracts.	The Government recommends any specific questions related to a Relevant Experience Project be directed to the Contracting Officer who awarded or is administering it.
Re CPARS and the Past Performance Substitution Form: We strongly recommend one consistent approach (the Past Performance Substitution Form) for collecting customer evaluations of past performance. CPARS evaluations are not consistently available for past performance (and never for non-Federal performance), and we've observed that ratings are applied inconsistently and vary according to the strictness or lenience of the evaluator. Requiring Offerors to use one form consistently will ensure fair and equitable evaluation methods and criteria are applied. Given the heavy weight of performance data to be applied in the bid-scoring process, this is a fundamental issue bearing on Offerors' submissions being evaluated in a fair and valid manner.	The Past Performance Substitute Form includes the same language found in a PPIRS Report to provide consistency and equitability in the evaluation of both documents.
Re past performance: Would work performed for a nonaffiliated customer under a prime contract held by an affiliated company be eligible for submission?	If the non-affiliated customer is outside of your corporate structure, yes.
Re Subcontracting Plan: Do proposed small business subcontractors need to have a primary NAICS code found in one of the HCaTS pools?	Offerors will not be required to identify specific subcontractors in their subcontracting plan. However, at the task order level Contractors may be required to substantiate the size standard of their subcontractors in accordance with the terms and conditions of the task order.
What information for scoring purposes should Offerors be prepared to provide for the subcontractors utilized on each project selected for past performance submissions? Do subcontractors need to be registered and have a SAM profile?	Offerors are prohibited from taking credit from entities outside of their corporate structure, including subcontractors.
In addition to DCAA being behind on their system audits, they are currently backlogged on annual incurred cost reviews. If a contractor's last approved rates from the most recent review were several years ago should they submit their indirect rates based on the prior approved rates or their prior fiscal year.	No, the Government will only accept forward pricing rate agreements or recommendations that have been issued within the last three years from date of solicitation closing.
Would OPM/GSA consider increasing the number of task orders an Offeror may utilize when using a "collection of task orders" from 6 to 10? In the past, we have had TMA projects where there has been up to 10 associated task orders that were all part of the same management plan.	At this time, the maximum number of task orders that can be included in a "collection of task orders" is six. However, we have increased the number of "collection of task orders" that can be submitted from one to two.
Would you be able to share what the point differentiation is for being the prime versus a sub on an engagement for the Small Business HCaTS? This was not evident from the self-scoring sheet.	Relevant Experience Projects performed for Federal customers as a Prime Contractor will receive 300 points. Relevant Experience Projects performed for Federal customers as a First-Tier Contractor will receive 150 points.
GSA is in the process of replacing and consolidating selected several GSA Schedule Contracts – e.g. MOBIS, PES, FABS, AIMS, LogWorld, etc. – with the new Professional Services Schedule (PSS). Will the HCaTS be affected in any way by GSA's move toward PSS? Will HCaTS be subsumed within PSS?	HCaTS is separate and distinct from any other contract vehicle and program.
In the May 19th Q&A you reference that accreditations will only be scored at the company level. Since most HR accreditations (SPHR, PHR, ICF, etc.) are received by the individual and not the company, other than accounting standards, what accreditations are you scoring?	All individual accreditations (e.g., PMP, degrees, etc.) associated with the Contractor Key Personnel have been removed from the RFP.
On the cost / pricing worksheet you show hourly rate break outs for fringe benefits, overhead, G&A, and profit. If we are not responding to cost reimbursement, do we need to provide this information, or is it optional for those not planning to provide the cost reimbursement option? Is the table supposed to calculate this automatically? If so, I placed a number in the direct hourly labor rate column and nothing calculated except the out years rates.	Attachment J.7 will be revised and all cost elements will be removed.

Based on the NAICS codes by pool and KSA, Can you share what NAICS codes and what KSA have generated the most contracts, and the most revenue by NAICS code and by KSA based on past TMA contracts?	That information can be located by searching FPDS-NG.
Cost/Pricing spreadsheet example: If our labor rate for an SME Manager is \$500, but your max direct hourly labor rate is \$111.20 does that exclude us from bidding? If I look at the GSA schedule rates for most Human Capital consulting forms, there rates are all higher than the rates you list in this table. How do you reconcile that to determine Min and Max, and fair and reasonable?	No, Offerors may be permitted to submit a rationale as to why their fully burdened rate(s) are higher than the Government's acceptable range.
Can you kindly explain what is the reason for combining NAICS in pools? Your response does not provide a satisfactory justification for combining more than one NAICS code into a family of a bunch of NAICS. Seems like it is designed to help the LARGE businesses. It is best considered as stand alone NAICS to keep the size small. I see a lot of issues, all NEGATIVE for small business, when NAICS are combined in pools as mentioned in this article, these are my two cents based on quick read of what is contained in posting: https://interact.gsa.gov/blog/relationship-between-ksas-and-naics-codes	NAICS Codes are grouped into Pools to determine the size standard of the Offeror consistently at the contract and task order levels.
Please remove the requirement that 4 of the required Past Performance citations must be performed under the specific Pool NAICS Codes for the specific pool, i.e., (NAICS 611430, 611699, or 624310 for (Pool 1 submissions and NAICS 541611, 541612, 541613, 651618, or 611710 for Pool 2 submissions), as this requirement eliminates larger contracts that provide a wider variety of services (to include the services identified for this effort) and essentially limits competition on the HCaTS effort.	At this time, the requirement will not be removed.
When we are counting the number of subcontractors that we might have under a prime contract, can we include as a subcontractor individual consultants who are typically 1099 individuals using their social security number since they have no Tax Identification Number? These are not employees of the company, but neither are they businesses as such. They are individuals. Similarly will vendors be considered subcontractors? For example if we have to purchase supplies or materials under an Other Direct Cost CLIN of a prime contract, are these third parties considered subcontractors?	To qualify as a subcontractor, the Offeror had to award a contract to another company.
GSA has indicated an interest in balancing the evaluation criteria to account for making prime contract awards to highly qualified medium businesses. During the virtual industry day presentation, it was stated that points for small business utilization will only be awarded in the unrestricted competition if the experience project has an associated ISR, SF 294, SSR or SF 295. This places emerging medium businesses at an unnecessary disadvantage regardless of their pattern of small business utilization. Qualified medium sized companies that have graduated from small business status within the previous five years may have a suite of highly relevant experience projects for which there is no associated ISR, SF 294, SSR or SF 295. Additionally, companies that have been successful on IDIQ vehicles that were awarded while the company was within the small business threshold, remain a small business under that IDIQ for the entire period of performance regardless of their business size. Therefor, even when competing as and operating as a medium sized business, highly relevant projects awarded under those IDIQ contract will still not have an associated ISR, SF 294, SSR or SF 295. Recommendation: For relevant experience projects awarded to an offeror on IDIQ on which they are considered a small business, and therefore have no set small business utilization goals or reporting requirement, the government might consider allowing those businesses to claim the small business utilization points by providing documentation that they were considered a small business at the time of the IDIQ contract award	If we understand your recommendation, you want the Government to give additional points to Offerors that were awarded Relevant Experience Projects as a small business. If that is correct, this would not benefit any small business under HCaTS SB as every Offeror will be a small business. Because the Government has a total small business set-aside contract vehicle, we don't think it is necessary to allocate additional points to small businesses under the unrestricted contract vehicle.

<p>Question: What NAICS code to use for TMA projects?</p> <ul style="list-style-type: none"> – According to page 61 of the question and answers (HCaTS_Draft RFP_Industry Questions (05202015)) all TMA task orders fall under NAICS code 541611 (Pool 2) – The RFP for the most recent TMA RFP (#OPM049-06-R-0022) issued in 2006 states (page 2 of 52, #2): "This solicitation is subject to a 50% Small Business Reserve as defined in Section 1.2 of the solicitation. The North American Industry Classification System (NAICS) code for this acquisition is 541611, Administrative Management and General Management Consulting Services with a size standard of \$6.5 million." – However our most recent awarded TMA IDIQ contract and subsequent task orders are all silent on the NAICS code. There is no mention of the NAICS code. – The only reference to NAICS codes for awarded work under the most recent TMA contract can be found in FPDS. The NAICS code listed in FPDS for all of our TMA projects is under 641140 (Pool 1) – Please confirm that we are able to use NAICS code of 641140 (Pool 1) for our TMA projects as shown in our FPDS report. 	<p>In accordance with Section L.5.2.1, The NAICS Codes shall be validated by the Federal Procurement Data System-Next Generation (FPDS-NG) Report. If the FPDS-NG Report is unavailable, the NAICS Codes shall be validated by the most current Contractor Performance Assessment Reports System (CPARS) Report, Past Performance Information Retrieval System (PPIRS) Report or Attachment J.6 (Past Performance Substitute Form). For Federal government Relevant Experience Projects where no FPDS-NG Report or CPARS/PPIRS Report exists, and the Offeror is unable to have a duly warranted Contracting Officer fill out Attachment J.6 (Past Performance Substitute Form), the Offeror shall provide other verifiable evidence from the contract, task order, or purchase order award form (i.e., SF 1449, SF 33, SF 26, DD 1155, GSA Form 300, or any other official Government solicitation from a Cognizant Federal Office). In the event there is a contradiction between the contract/task order/purchase order award form or solicitation and FPDS-NG Report, the contract/task order/purchase order award form or solicitation takes precedence. In the event there is a contradiction between the FPDS-NG Report and the most current CPARS/PPIRS Report or Attachment J.6 (Past Performance Substitute Form), the FPDS-NG Report takes precedence. This order of precedence applies unless a duly warranted Contracting Officer responsible for the Relevant Experience Project submits an Attachment J.10 (NAICS Code Confirmation Form) that indicates the NAICS Code that they select in Attachment J.10 (NAICS Code Confirmation Form) represents the preponderance of work performed. For a Federal government Relevant Experience Project, if the Offeror does not provide verifiable documentation (FPDS-NG Report, CPARS/PPIRS Report, Attachment J.6 (Past Performance Substitute Form), Attachment J.10 (NAICS Code Confirmation Form), or official Government award form or solicitation), the Relevant Experience Project shall not be considered as one of the four Relevant Experience Projects that shall have a Pool NAICS Code.</p>
<p>Please provide clarity regarding the section below from the most recent (May 20) draft section L; specifically, must the Past Performance Substitution Form be completed by a CURRENT employee of the customer organization, or would a FORMER employee be acceptable if that person had the most direct experience and knowledge of the contract, but has since left the position or retired? Thank you for clarifying this issue.</p> <p>If the Relevant Experience Project is a Federal government contract, task order or purchase order, the Attachment J.6 (Past Performance Substitute Form) shall be completed by an employee of either the Contracting Entity or Customer/Client Organization who has direct knowledge of the contract, task order or purchase order. If the Relevant Experience Project is a Non-Federal government contract, task order or purchases order, Attachment J.6 (Past Performance Substitute Form) shall be completed by an employee of the Contracting Entity or Customer/Client Organization who has direct knowledge of the contract, task order or purchase order. If the Offeror is a First-Tier Subcontractor, Attachment J.6 (Past Performance Substitute Form) shall be completed by an employee of the Prime Contractor who has direct knowledge of the contract, task order or purchase order. The individual who fills out Attachment J.6 (Past Performance Substitute Form) will be certifying that he holds direct knowledge of this Relevant Experience Project and represents the Project Owner</p>	<p>The form has to be completed by a current employee of the organization who can certify they have direct knowledge of the Relevant Experience Project.</p>

<p>In order to develop a government-wide contract for human capital and training solutions that meets the needs of Federal agencies at a best value to taxpayers, it is recommended that:</p> <p>1. GSA provide additional clarification on the connection between work performed under the current TMA contract and the scope of the Pools under the upcoming HCaTS contract. We understand that due to NAICS code assignments under the previous TMA contract, many current TMA contractors prior past performance would be restricted to Pool 1 and as a result, they would not be eligible for Pool 2. We are concerned that this approach limits competition solely based on previous NAICS code assignments rather than the actual work previously performed and the ability of vendors to perform work within the scope of Pool 2.</p> <p>2. OPM and GSA fully and transparently address the evaluation of past performance/experience on TMA work tasks. Specifically, given what appears to be a lack of contemporaneous past performance evaluations, OPM and GSA should explain to TMA incumbents 1) the extent to which past performance evaluations were conducted during the term of the TMA contract, and 2) to the extent that they were not done, disclose how past performance evaluations will be processed in the context of the HCaTS procurement. This information is absolutely critical for TMA contractors at this point given the anticipated release of the Final RFP in July 2015.</p> <p>3. GSA allow for the submission of multiple bundled task orders for</p>	<p>Each Pool consists of the same scope, prescribed in Section C. HCaTS is a first generation category management initiative; therefore, the Government anticipates receiving proposals from companies that have not historically worked with OPM or been awarded a TMA contract.</p> <p>Current TMA contractors with questions pertaining to their specific TMA contract should contact their respective OPM Contracting Officer.</p> <p>The maximum number of Relevant Experience Projects that can be submitted as a "collection of task orders" has been increased to two.</p> <p>The Government recognizes that there are additional responsibilities associated with being the Prime Contractor versus a Subcontractor; therefore, additional points have been assigned to Relevant Experience Projects performed as a Prime Contractor for the Federal government.</p> <p>Including share-in-savings contract types may be awarded at the task order level if determined appropriate and allowable by the OCO.</p>
<p>Reference: Page 23, Section L.5.1.9.1, Financial Resources, Paragraph 2.</p> <p>The solicitation states that the Offeror shall submit three completed copies of GSA Form 527. Could the government please clarify the number of completed copies of GSA Form 527 to be submitted? If only one copy is to be submitted, can the government please clarify if the requirement is intended to read, "The Offeror shall provide one completed copy of GSA Form 527, Contractor's Qualifications and Financial Information, located at www.gsa.gov/forms. Copies of its 2013 and 2014 year-end financial statements and a copy of its 2015 interim financial statements shall be provided in lieu of completing Sections III and IV of GSA Form 527 with CPA-prepared financial statements preferred."</p>	<p>The RFP will be amended to clarify the Government's intent.</p>
<p>Reference: Page 8, Section L.4.1 Proposal Format Table.</p> <p>The Proposal Format Table includes a requirement and example file name for a .pdf submission related to the Offeror's SAM registration:</p> <p>1) L.5.1.9.2 System for Award Management SAM Website Entity Record Limited to the SAM registration only. ABC.VOL1.SAM.pdf</p> <p>Could the government please clarify what is to be submitted in the .pdf file? For example, should the Offeror submit a .pdf copy of its "Entity Overview Details" from SAM, a copy of its FAR & DFARS Report from SAM, both, or something else?</p>	<p>The Offeror's entire SAM record shall be submitted.</p>

<p>Reference: Page 8, Section L.4.1 Proposal Format Table and Attachment J.4</p> <p>The Example File Column in the Key Personnel Row of the Proposal Format Table states that Contractor Key Personnel 1 and 2 refers to the positions listed in Attachment J.4(Pool Application and Certification). However, Attachment J.4 does not include a section for Offeror's to list Contractor Key Personnel. Instead, Attachment J.4 requests that Offerors list a Primary and Alternative Point of Contract for representatives with authority to commit the Offeror to contractual obligations for the HCaTS contracts. However, positions with the authority to commit a company (signature authority) are not as uniform in industry as they are in the government. For instance, in some companies only someone in the contracts department has signature authority, while in others that authority is reserved for a vice president, president, CEO, etc. As such, the Offeror's proposed Contractor Key Personnel may not necessarily be the same as the Offeror's Points of Contact listed in J.4. Please confirm that the Offeror's Contractor Key Personnel do not have to be the same individuals as the points of contact that can commit the company found in J.4.</p>	<p>The Offeror's Contractor Key Personnel do not have to be the same individuals as the points of contact that can commit the company.</p>
<p>Concern 1: Limiting to one project per pool the bundling of no more than 6 task orders</p> <p>Since 2007, the OPM TMA contract has funded over \$2B worth of Human Capital (HC) and Training (TR) services to the federal government. The majority of these projects involved numerous modifications over several years. Typically, when a modification to an existing OPM TMA task order was required, a new task order was generated. In addition, with sequestration and the overall decline in federal budgets, it has been common for clients to incrementally fund their respective HC/TR projects. Again, rather than issuing a modification to the current task order, a new task order to incrementally fund and/or extend the period of performance was issued. Therefore, limiting projects submitted to just one bundled project per pool arbitrarily reduces the ability of current TMA industry partners/contract holders to use legitimate TMA projects that would under other task orders/other contracts have been completely performed under a single task order, with multiple mods rather than as a series of new task orders. More importantly, this severely limits the government's ability to review past performance projects from the current OPM TMA contract – one of the largest, if not the largest, HC/TR contract in the government – and restricts the government's ability to review some of the largest, most complex, longest-duration, and impactful HC/TR projects performed for the federal government. Additionally, we believe that this situation is also experienced in other non-TMA projects - the factors responsible for creation of multiple task orders rather than mods potentially affect all HCaTS offerors equally, for example, regardless of their respective size (i.e., small, medium, large). Thus, limiting to one project per pool the</p>	<p>The maximum number of Relevant Experience Projects that can be submitted as a "collection of task orders" has been increased to two.</p>

<p>Concern 2: Past performance completed as a subcontractor</p> <p>We recognize and acknowledge GSA/OPM updating the draft RFP to award more points for work performed as a Prime (300 points) versus work performed as a Subcontractor (150 points) but believe more needs to be done to reduce performance risk and prevent other unintended consequences. We understand that GSA and OPM are looking for the best in class in HC/TR vendors. Thus, it is reasonable to expect vendors responding to the full and open contract to have past performances completed as the Prime, for a number of reasons.</p> <p>Prime contractors are directly responsible to the ultimate customer for managing costs, schedule, quality of performance, and risks on the overall project. Prime contractors must be able to effectively address delivery in the customer context, recognizing the unique requirements and culture of the customer organization in ways that subcontractors do not – such issues are managed by Primes for subcontractors when subcontractors are hired. In addition, the Prime needs to perform in order to be successful, thus it is the Prime that provides oversight and is ultimately responsible for deliverables to the end customer in ways that a subcontractor is not (e.g., contract cost, schedule, performance and risk management for the entire contract).</p> <p>Future client agencies that intend to use HcaTS will have a minimum expectation that all of the Prime contract holders have successfully completed significant work as a Prime. Failing to uphold that expectation may result in an offeror winning an HCaTS award, then</p>	<p>The Government believes the current point allocation is fair and reasonable.</p>
<p>Concern 3: Evaluation of past performances completed as a subcontractor</p> <p>In our opinion, allowing the prime contractor to evaluate a subcontractor's performance creates significant Organizational Conflict of Interest (OCI) concerns relating to biased judgment. We believe that there are significant differences between how the government and a Prime contractor may evaluate contractor performance on a project. The federal government can be trusted to provide an unbiased opinion of contractor performance. The government is free to provide positive/constructive feedback without concern for jeopardizing relationships or negatively impacting future opportunities. The same cannot be said of the vendor community. Allowing vendors to evaluate each other could result in actual or perceived favoritism or other OCI; and the government would be unable to identify or mitigate such risk given the current draft RFP. For example, Vendor A has teamed with Vendor B (and vice versa) in the past to win and perform work. If one was asked to evaluate the other's performance it is likely that to avoid damaging the relationship and thus the ability to team together to win future work, the evaluator may artificially inflate the overall performance of the other firm as needed to provide a strong score and build goodwill for future work.</p> <p>In order to protect the integrity of the HCaTS procurement for the full and open contract, we believe it is in the government's best interest to conduct due diligence on subcontractor past performance evaluations to ensure a Prime contractor's assessment of a subcontractor is fair and unbiased.</p>	<p>The Government will validate all information provided by all Offerors.</p>

Both J.5.1- Self Scoring Worksheet Pool 1 and J.5.2- Self scoring Worksheet Pool 2 appear to have issues with the current versions. We noted that there were calculation errors when inputting our information. Does the government anticipate releasing updated versions, with the auto-population errors corrected, of the self-scoring worksheets prior to the release of the RFP? We have also reviewed the OASIS Self scoring sheets, and noted they have a cleaner look which makes it easier to identify the scoring points, as well as easier to work with. Would the government consider releasing updated versions of the self-scoring documents via an Interact post or an additional draft release?	All forms will be corrected by the time the final RFP is released.
GSA Form 527 and 2013-14 Financial Statements (L.5.1.9.1, p.23): As a result of our firm's structure we are not in a position to distribute financial statements or provide privileged financial information requested in GSA Form 527. In lieu of providing these documents, would it be acceptable to submit an alternative attestation of the financial health of the organization (e.g., total revenues, employee count)?	No. GSA Form 527 is a required document as per the RFP instructions.
Employee Compensation Plan (L.5.1.3, p.14-15): The requirement for an employee compensation plan that includes the methodology for determining fringe benefits will not be feasible for firms without cost accounting systems or processes in place to make this determination. This methodology would only be relevant for Offerors bidding on cost-reimbursable task orders. Would GSA consider removing the requirements for the employee compensation plan for Offerors who do not intend to bid on cost-reimbursable task orders?	No, this is a requirement in accordance with 52.222-46.
Uncompensated Overtime Policy (L.5.1.4, p. 15): The requirement for Offerors to submit an uncompensated overtime policy that is consistent with cost accounting practices used to accumulate and report uncompensated overtime hours will not be applicable to firms without a cost accounting system or associated practices. Would GSA consider removing the requirements for the uncompensated overtime policy for Offerors who do not intend to bid on cost-reimbursable task orders?	No, this is a requirement in accordance with 52.237-10.
Cost-Price Worksheet (L.5.5, p.44): The current version of the Cost-Price Worksheet requires Offerors to submit direct labor rates in addition to fringe benefits, overhead, G&A, and profit percentages. Firms that do not have cost accounting systems that support cost-reimbursable contracts will not have the ability to divide labor costs in this manner. Will an alternate form be provided that does not require the breakdown of the labor rate to firms that do not intend to bid on cost-reimbursable contracts?	Attachment J.7 will be revised, removing the requirement to breakout individual cost elements of the fully burdened rates.
Existing Joint Venture or Partnership (L.5.1.8, p.21): The HCaTS draft RFP stipulates that all proposal documents must have been submitted under an existing joint venture. Per FAR regulation 19.101.7.i, joint ventures are entered into for a single contract and do not exist on a permanent basis. Is the expectation that joint venture bidders will have formed a separate joint venture with the same partners for every past performance credential which they submit?	If submitting a proposal as an existing Joint Venture, all Relevant Experience Projects shall have been performed by that Joint Venture.
Contractor Key Personnel (L.5.1.10, p.26): What documentation should Offerors provide to substantiate proof of employment of Contractor Key Personnel?	There is no requirement to submit proof of employment.
Cost-Price Worksheet (L.5.5, p.44): The breadth of labor categories may be larger than any one Offeror can provide as they include several heavily specialized roles (e.g., industrial-organizational psychologists, statisticians). Will it be necessary to submit labor rates for every position listed in the Cost-Price Worksheet?	Yes
How are you defining "HR Development" for KSA 2? I understand HR Development to encompass training/learning/leadership development, etc..... more like the KSA 1	HR Development under KSA 2 would include programs or initiatives that address the development of human resources within the context of human capital management but outside the more limited scope of KSA 1 – Customized Training and Development Services.

For Purposes Of determining CAS coverage, is value of HCaTS GWAC contract > \$50M?	Yes
Is HCaTS GWAC of a type that requires CAS coverage?	It depends on the Offeror's specific circumstances. Reference 48 CFR 9903.201-1 and 48 CFR 9903.201-2 for exemptions.
Under what circumstances is the offeror required to submit a disclosure statement with the proposal?	It depends on the Offeror's specific circumstances. Reference 48 CFR 9903.201-1 and 48 CFR 9903.201-2 for exemptions.
<p>I am rather concerned that the discussion at the Industry Day to revisit this matter is proceeding without a commitment to relook at it. The fact is that while it makes a lot of sense to require that past performances demonstrate a certain NAICS code, this standard is not being utilized throughout government. Thus, it is unfair to apply this standard to the potential bidders on HCaTS until the entire federal government comes to agreement on the use of NAICS codes upon contract award. The reality is that NAICS codes are often applied arbitrarily to a contract in order to "reach" a certain vendor. A lot of times those NAICS codes do not accurately reflect the entire work being done on a contract because NAICS codes are purposefully broad to allow for the application to be applied broadly. Again, they don't accurately reflect the entire work that is being done.</p> <p>While I understand that the HCaTS team would like the vendors to ask our clients to use this form to articulate that different NAICS codes could apply, I think it is quite unrealistic to expect Contracting Officers to complete this additional paperwork particularly when we are in the 4th quarter of the fiscal year. As vendors, we are very sensitive to the lack of time that Contracting Officers have to complete additional paperwork on our behalf.</p>	The Government has revisited this topic and will not amend the RFP. This evaluation methodology was successfully employed by OASIS and is in the Government's best interest to use for HCaTS.
In preparation of a bid for HCaTS SB, we are preparing the NAICS code verification form. We went through a similar exercise when pursuing our GSA schedule. Instead of contacting our customer again and having her fill out a NAICS code verification form, can we use an letter, which contains the required NAICS code confirmation, signed by our contracting officer?	No, Offerors shall use the form prescribed in the RFP.
<p>Can you please clarify if we can use a past performance substitution form on a program that has a CPAR score but is outdated?</p> <p>In one situation we have a CPAR that is 3 years old and not reflective of the program performance today and the customer indicates they may not release an official CPAR anytime soon.</p> <p>Using this form in this situation would be beneficial to provide GSA the best citations possible on HCaTS.</p>	Offerors shall submit the most recent past performance information for each Relevant Experience Project. As prescribed in the RFP, "Only in the event CPARS/PPIRS information is not available will an Offeror be allowed to submit an Attachment J.6 (Past Performance Substitute Form)."

<p>I wanted to make sure that I am correctly interpreting the latest HCaTS instructions from OPM. Page 6 of the attached document received on June 25 describes what constitutes a "collection of task orders" for the OPM TMA Contract . The second bullet reads "Only projects awarded under the OPM/TMA Program IDIQ may be included on the Collection of Task Orders Confirmation Form submitted to OPM for processing." I read this to mean that only multiple related "Projects" awarded under the IDIQ would constitute a "collection of task orders". Therefore, a single awarded Project, even if it was funded through incremental TOs and Mods, would not constitute a collection of task orders. A single awarded OPM project would not constitute at a "collection of task orders" and we can use more than two if we like. Is this the correct reading? I have received no clarity from GSA specific to OPM TMA projects. They have referred me to OPM to determine what constitutes a collection of task order and what does not.</p>	<p>"A ""collection of task orders"" is defined as follows:</p> <p>Two out of the six required Relevant Experience Projects may, at the discretion of the Offeror, be a "collection of task orders" placed under a master Single Award or Multiple Award, Indefinite Delivery task order contract, or master Single Award or Multiple Award Blanket Purchase Agreement; or, any other master contract vehicle (e.g., Project Number/Title) that the task orders were directly awarded under if the following applies:</p> <ol style="list-style-type: none"> 1. The "collection of task orders" shall not exceed six task orders, and 2. None of the task orders in the collection shall also be used as a stand-alone Relevant Experience Project, and 3. Each successor task order was a logical follow-on task order to the predecessor task order, with no more than a 30 calendar day gap between the effective date of the successor task order and the end date of the predecessor task order, and 4. Each task order was awarded by an entity outside of your corporate structure, and 5. Services provided under each task order has been performed within the past five years prior to the solicitation closing date; or, be ongoing, and 6. Each task order's scope was inclusive of at least one KSA (Customized Training and Development Services, Customized Human Capital Strategy Services, or Customized Organizational Performance Improvement) and some component of the KSA-related service and/or product customized, and 7. The Offeror shall submit a completed Attachment J.9 (Collection of Task Order Confirmation Form) that is signed by a duly warranted Contracting Officer (or commercial equivalent Authorized Official for a Non-Federal government project). <p>If the TMA project meets this definition, it can be submitted as a ""collection of task orders"".</p>
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